

# Privacy Policy

Energy On - Simplifying Utilities

Date: April 2019



# Privacy Policy

## Introduction

We are committed to the protection of personal privacy and have adopted a policy to protect information about individuals. This policy describes the information we collect and hold, how we use that information, how that information may be disclosed, the security of that information, how you can access and correct any such information and other relevant details concerning your privacy.

Energy On Pty Ltd (ABN 90 145 225 485) provides electricity, gas, hot water, energy-related services and other products.

## Collection of Personal Information

Energy On may collect personal information about you either directly from you or from the Owner(s) or Owner(s) Manager where you reside. This information usually consists of your name, property address, contact details, identification and other related information regarding the provision of services.

If you elect to pay your invoices online, then we may also collect information about you through our website. We may also collect and store information about your visit to our website including:

- the name of the domain from which you accessed the internet
- the date and time you accessed the website
- the internet address of the website from which you linked directly to our website
- the pages you accessed while visiting our website

The information does not in itself identify persons and is used to measure the number of visitors to the website and how it was navigated. This information assists us to make the website more useful to you.

If you do not wish us to collect or retain personal information about you then we may not be able to provide our services to you.

## How Do We Use Your Personal Information?

Personal Information is used for the purposes of providing services to the individual. The services include managing the Embedded Network and providing you with utility services (such as electricity, gas, hot water, cold water or telephony) and forwarding invoices to you for use of those utilities.

## Security of Personal Information

We take reasonable steps to ensure the security of all information we collect from risks such as loss, or unauthorised access, destruction, misuse, modification or disclosure of data. We will not disclose or pass on your personal information to third parties unless it is in accordance with this Privacy Policy or with your prior consent.

## Disclosure of Personal Information

Energy On may elect to disclose personal information to:

- The Owner(s) or Owner(s)' Manager where you reside;
- To related Energy On companies for verification and management purposes;
- Where any functions or services are being outsourced to third parties, agents or sub-contractors who assist us in providing services to you or you would reasonably expect us to disclose to a third party for a particular purpose;
- Debt collection agencies, courts, tribunals or other authorities where you fail to pay for the Utility Services provided; and,
- Where disclosure is necessary to prevent injury to life or health, to investigate any suspected unlawful activity or where it may be required by law such as in a response to a warrant, subpoena or other legal process.

Where we disclose your personal information to third parties for these purposes the third party will be obliged to use that personal information in accordance with this Privacy Policy.

We do not generally disclose personal information to overseas recipients and will not do so before taking reasonable steps to ensure that an overseas recipient is compliant with Australian Privacy Principles.

## Credit and Credit Eligibility Information

Where we provide products or services to you on credit (that is, you will pay for those products or services after we start providing them to you), we are a credit provider for the purposes of the Privacy Act. As such, we must comply with rules in the Privacy Act in relation to the handling of information relating to credit reporting. We may collect credit related information about you and hold that credit information electronically and in hard copy form, both at our own premises and with the assistance of our service providers, when you apply for and open an account with us. This includes information we collect from you but may also be collected from other credit providers and from credit reporting bodies. The credit reporting body we currently use to perform credit checks is Equifax.

The credit related information we collect includes:

- Your personal details such as identification and aliases.
- Your credit history.
- Details of any credit you have sought or obtained from other credit providers.
- Any credit rating or credit assessment score that a credit reporting body may provide to us.
- Details of prior overdue payments, credit infringements, defaults, bankruptcies and judgments.

We collect, hold and use this credit related information to evaluate your credit eligibility and what level, if any, of credit we can provide to you or continue to provide to you, and to manage our relationship with you. This may see us deriving a credit assessment score in relation to you from information disclosed to us by credit reporting bodies.

If your application for credit is refused by us based on information provided to us by a credit reporting body, we will inform you of this and provide you with the name and contact details of that body.

We may disclose your credit information to Equifax or any other credit reporting body, including information about your application, payment history and defaults. These credit reporting bodies may

disclose this credit information to other credit providers while assessing your credit worthiness.

We may report to any credit reporting body any information regarding your outstanding payments, defaults or payments more than 60 days overdue when we are permitted by law to do so. If the credit we have provided to you, including any late payment fees, accrued interest, or other fees we are legally permitted to charge, is then paid or is otherwise discharged, we will notify the credit reporting body that your payments are no longer outstanding.

We may also disclose information about you to debt collectors and other third parties providing credit related services to us, and to third parties to whom we may assign your debts.

The third parties described above to whom we may disclose credit related information may be located in Australia or in other countries.

## Access and Correction of Personal Information

You may request access at any time to the personal information that we hold about you. You can do this by emailing us at [TheTeam@EnergyOn.com.au](mailto:TheTeam@EnergyOn.com.au). If any information we hold about you is out-of-date, incomplete or inaccurate we will be happy to update it.

## Record Keeping

Energy On maintains a 'No Contact List' of small customers who have opted out of receiving any marketing material Energy On may send in the future. Customers on this list have a 2 year inclusion period. This period is refreshed if the customer requests inclusion or maintenance of inclusion. To be listed on the 'No Contact List' please email us at [TheTeam@EnergyOn.com.au](mailto:TheTeam@EnergyOn.com.au).

## Cookies and Links to Other Websites

We may use cookies on our website from time to time. Cookies are placed in your computer's browser to store your preferences. Whilst they do not, by themselves, tell us your e-mail address or other personally identifiable information once you choose to furnish the website with personally identifiable information, it may be linked to the data stored in the cookie.

Our website may contain links to other websites of interest. We do not have any control over those websites. We are not responsible for or liable for the protection and privacy of any information which you provide whilst visiting such websites, and such websites are not governed by this Privacy Policy.

## Cessation of Services

If Energy On ceases to provide you with services, we will retain your personal information for a period of at least 2 years.

Energy On will not disclose your personal information to the Owner(s) or Owner(s)' Manager where you reside for the purposes of contacting you to sign up with a different provider.

## Complaints

If you believe that we have breached the Australian Privacy Principles and wish to make a complaint about that breach, then please email us at [TheTeam@EnergyOn.com.au](mailto:TheTeam@EnergyOn.com.au) setting out details of the breach. We will promptly investigate your complaint and respond to you in writing setting out the outcome of our investigation, what steps we propose to take to remedy the breach and any other action we will take to deal with your complaint.

## Amendments to this Policy

We may change this Policy from time to time to accommodate changes in the collection and use of personal information by us or to accommodate new laws, regulations or industry codes.

## Document History

| Version | Date          | Author      | Comment                       |
|---------|---------------|-------------|-------------------------------|
| 1.0     | March 2016    | C. Hancock  | Draft issued for consultation |
| 1.1     | December 2017 | A. McMeekin | Document reviewed             |
| 1.2     | April 2017    | A. McMeekin | Formatting update             |
| 1.3     | October 2018  | R. Di Noto  | Content review                |
| 2.0     | March 2019    | E. Buxton   | Formatting update             |
| 2.1     | April 2019    | R. Di Noto  | Content review                |